

Alexandria Division

Count 1: Conspiracy to Commit Immigration Fraud

reasonable basis in law and fact, in violation of Title 18, United States Code, Section 1546. In furtherance of this same conspiracy, the defendant and his fellow conspirators knowingly prepared immigration applications containing false statements and declarations and presented these same applications to the Immigration and Naturalization Service for adjudication. (In violation of Title 18, United States Code, Sections 371 and 1546(a).)

Count 2: Money Laundering

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about March 18, 2002, in the Eastern District of Virginia, the defendant, STEVEN Y. LEE, unlawfully and knowingly conducted and attempted to conduct a financial transaction affecting interstate commerce, which transaction involved the proceeds of a specified unlawful activity, with the intent to promote the carrying on of said specified unlawful activity, and that while conducting and attempting to conduct this financial transaction, the defendant knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity. Specifically, on or about March 18, 2002, in Fairfax, Virginia, the defendant wrote a check directing the Bank of America to transfer the sum of \$910.78 from one of the defendant's business accounts at the Bank of America branch in Fairfax, Virginia (account number 0041-1889-1110 in the name of Lee, Baker & Warren, PLLC), to Jane Doe in order to create a false record of employment for Jane Doe. At the time of this transaction, the defendant knew that the funds transferred to Jane Doe involved the proceeds of the defendant's illegal activities to commit labor certification fraud, in violation of Title 18, United States Code, Section 1546, and intended his payment to Jane Doe to promote these same illegal activities. Title 18, United States Code, Section 1546, is a specified unlawful activity as that term is defined in Title 18, United States Code, Section 1956(c)(7)(A).

(In violation of Title 18, United States Code, § 1956(a)(1)(A)(i).)

Criminal Forfeiture

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

Upon conviction of the offense charged in count 1 of this information, the defendant, STEVEN Y. LEE, shall forfeit to the United States any property, real or personal, that constitutes, or is derived from, or is traceable to the proceeds obtained directly or indirectly from the commission of this offense, up to and including a sum of \$800,000.

(Pursuant to Title 18, United States Code, Section 982(a)(6).)

PAUL J. MCNULTY
UNITED STATES ATTORNEY

By:
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